

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

D.S. by and through her next friend  
TARA URS; *et al.*,

Plaintiffs,

v.

WASHINGTON STATE  
DEPARTMENT OF CHILDREN,  
YOUTH, AND FAMILIES; *et al.*,

Defendants.

NO. 2:21-cv-00113-BJR

STIPULATION AND ORDER  
REGARDING DISCOVERY  
RESPONSES AND  
AMENDMENT TO  
SCHEDULING ORDER

**I. STIPULATION**

The parties, by and through their respective attorneys of record, hereby stipulate to the following:

1. The parties agree that the current date for Defendants' responses and objections to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents should be extended for two weeks to be served on or by June 24, 2021. The current 30-day due date for such responses and objections is June 10, 2021. The reasons for extending this date include the volume of discovery sought, DCYF's need for additional time to formulate answers and responses, including the anticipated timing for completing such responses, and the requirements for meeting and conferring with counsel and responding to the Court under Dkts. #57-#58.

2. The parties agree that the current pretrial schedule in this matter (Dkt. #22) should be amended to set the date for filing the motion for class certification so that—instead of the current date set by LCR 23—Plaintiffs’ motion for class certification will be filed on or by September 3, 2021. The reasons for setting this date include, but are not limited to: (1) the volume of pending discovery sought by Plaintiffs; (2) the timing of production of discovery responses informing the class certification process; and (3) the current schedule for submissions to the Court under Dkts. #57-#58 and any compliance process that may follow.

3. The parties agree that this Court should enter an order that approves and adopts this stipulation.

RESPECTFULLY SUBMITTED this 9th day of June, 2021.

PLAINTIFFS’ COUNSEL

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s/ Daniel J. Judge  
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## II. ORDER

IT IS HEREBY ORDERED that:

1. The stipulation of the parties is APPROVED AND ADOPTED. Dkt. #22 is AMENDED: Plaintiffs’ Motion for Class Certification be filed on or by September 3, 2021.

2. Defendants shall serve their responses and objections to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents on or by June 24, 2021.

Dated this 10th day of June, 2021.



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BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE